

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

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| IN THE MATTER OF THE COMPLAINT OF MAERSK TANKERS AS, AS OWNER AND OPERATOR OF THE M/T CARLA MAERSK FOR EXONERATION FROM OR LIMITATION OF LIABILITY | § C.A. No. 3:15-CV-00106 § § (ADMIRALTY) § § F.R.C.P. 9(h) § |
| IN THE MATTER OF THE COMPLAINT OF CONTI 168. SCHIFFFAHRTS-GMBH & CO. BULKER KG MS “CONTI PERIDOT” AND BREMER BEREEDERUNGSGESELLSCHAFT MBH & CO. KG FOR EXONERATION FROM OR LIMITATION OF LIABILITY | § consolidated with § C.A. No. 3:15-CV-00237 § (ADMIRALTY) § F.R.C.P. 9(h) § |

**UNOPPOSED MOTION FOR ENTRY OF
EXTENDED CONDITIONAL DISMISSAL ORDER**

COME NOW Conti 168. Schifffahrts-GMBH & Co. Bulker KG MS “Conti Peridot” (“Conti 168”) and Bremer Bereederungsgesellschaft MBG & Co. KG (“BBG”), and hereby file their Unopposed Motion for Entry of an Extended Conditional Dismissal Order to allow for completion and funding of pending settlements and entry of a final judgment once the pending settlements are completed and funded.

I.

Conti 168 and BBG’s settlements with Maersk Tankers AS (“Maersk”), the Westergren Claimants, and the Bonner Claimants are in process but will require additional time to complete and be fully funded. Conti 168 and BBG anticipate that all these settlements, including the settlements with 1214 Bonner Claimants, can be completed within the next 90 days. Entry of an extended conditional dismissal order would allow the parties to complete the pending settlements while allowing the conditionally dismissed claims to be

subject to reinstatement if the settlements are not consummated (and paid) within the time period provided by the extended conditional dismissal order.

WHEREFORE, PREMISES CONSIDERED, Conti 168 and BBG request that the Court enter a Conditional Dismissal Order allowing 90 days to complete the pending settlements with Maersk, the Westergren Claimants and the Bonner Claimants. This relief is unopposed by any other party.

Respectfully submitted,

By: /s/ David R. Walker

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**ATTORNEYS FOR LIMITATION PLAINTIFFS,
CONTI 168. SCHIFFFAHRTS-GMBH & CO.
BULKER KG MS “CONTI PERIDOT” and BREMER
BEREEDERUNGSGESELLSCHAFT MBH & CO.
KG**

**OF COUNSEL:
ROYSTON, RAYZOR, VICKERY & WILLIAMS, L.L.P.**

CERTIFICATE OF CONFERENCE

I have conferred with counsel for all the parties and they do not oppose the relief requested by this Motion.

/s/David R. Walker

Of Royston, Rayzor, Vickery & Williams, L.L.P.

CERTIFICATE OF SERVICE

I certify that on this the 8th day of August 2019, a true and correct copy of the foregoing was served upon the all counsel of record by Notice of Electronic Filing via CM/ECF, in accordance with the Federal Rules of Civil Procedure.

/s/ David R. Walker

OF ROYSTON, RAYZOR, VICKERY & WILLIAMS, L.L.P.